

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

Plaintiff,

DELIA J. BAEZ,

Defendant.

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CIVIL NO. 10401-RCL

ASSENTED-TO MOTION FOR EXTENSION OF THREE BUSINESS DAYS

The United States requests that this Court grant an extension of three business days for the filing of a dispositive motion in this action. On November 3, 2005, this Court set a deadline of December 30, 2005, for the filing of motions. However, due to the holidays, counsel's best laid plans have gone astray and she has been unable to obtain all of the information needed to present to the Court in support of the government's motion for summary judgment. She anticipates obtaining that information and filing the government's motion on or before January 5, 2005, and, accordingly requests that the deadline be extended until January 5.

Counsel for Defendant assents to this Motion.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

/s/ Anita Johnson

ANITA JOHNSON

Assistant U.S. Attorney

Moakley United States Courthouse

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Certification of Rule 7.1 Conference

I hereby certify that on this 29th day of December 2005, I conferred with counsel for Defendant, William Keefe, and he assented to this motion.

/s/ Anita Johnson
